Applicant : Jeff Young et al.                  Attorney's Docket No.: 07844-292001 / P268
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## REMARKS

Claims 14-18, 20-30, and 32-40 were pending as of the Office action mailed April 5, 2005. All claims were rejected in the action.

Claims 14, 16-17, 20, 25, 28-30, 32, 37, and 39 have been amended. Claims 1-13, 15, 19, 21, 26-27 and 33 have been cancelled to expedite prosecution and without prejudice. No new matter has been added. The applicant respectfully traverses the rejections and requests reconsideration in view of the amendments to the claims and the following remarks.

### Section 103 Rejections

Claims 14-18, 20-30, and 32-40 were rejected under 35 U.S.C. §103(a) as allegedly unpatentable over Motoyama et al. (U.S. Patent No. 6,009,436) ("Motoyama") in view of Takasawa et al. (GB 2 307 571 A) ("Takasawa").

<u>Claims 14, 25, and 28.</u>

Claim 14 has been amended to recite that common patterns in DTD elements are identified by comparing two document type definitions (DTD) – a first DTD and a target DTD – in a computer executed method. These common patterns are used to map elements in a source document that had conformed to the first DTD so as to recode a document according the target DTD.

Neither Motoyama nor Tagasawa disclose this feature.

Motoyama discloses the use of two DTDs; however, the DTDs are used are inputs to an editor used <u>by a user</u> to define a mapping. This is clear from the Abstract of Motoyama: "The present invention operates as a user tool by accepting interactive input from a user of a source input, by processing the input to display the source input in a format for accepting and processing user commands to create or edit a transformation map of source components to target components." *See, also*, Motoyama, col. 26 line 66 – col. 27, line 11 (emphasis added):

> For other implementations, **the same techniques described with regard to the SGML to HTML mapping and transformation are utilized**, with structure of information defined differently from an SGML DTD. In general terms, a parser breaks down an input source file into source components and their structure, based upon a structure format specified for the input source

file, for map creating and editing. **The source components and their structure are presented to the user for interactive selection of components of the first structure, with candidate target components of the second structure presented to the user for selection of target components for the mapping** of the source components for creation of rules for a transformation map.

In rejecting claim 16, which had read "identifying patterns common to the first and second source documents comprises: examining document type definitions for the first and second source documents", the Examiner wrote that "Motoyama teaches transformation of an SGML document into an HTML document, said transformation incorporating analyzation [*sic*] of their respective DTDs, and utilizing the mappings of Appendices A-D." The Examiner cited the Abstract, column 6, lines 1-4 and 30-32, Appendices A-D, and Figures 3A-3B. However, these passages do not teach or suggest what the claim now requires, namely that the first and the target DTD are compared to identify common patterns between the two DTDs, and that the common patterns so identified are used to map automatically elements and sub-elements of the first DTD in the first source document to equivalent elements and sub-elements to recode the first source document according to the target DTD.

Claims 25 and 28 have been amended with amendments corresponding to those made to claim 14. For the foregoing reasons, these claims and the claims depending from them are allowable over the cited art.

<u>Claims 22 and 34.</u>

Independent claims 22 and 34 were rejected by applying "Takasawa's pattern identification to Motoyama, providing Motoyama the benefit of simplifying the exchange of similar documents for reuse, by taking into account common patterns in the mapping process (Takasawa page 1 at middle)."

Takasawa at the middle of page 1 states that SGML is a standard created to simplify the exchange of similar documents. Takasawa can create a single DTD from a single source document or from multiple source documents (*e.g.*, page 25). However, when the claim recites that a pattern "common to the source document and the set of source documents" is identified, this requires that two groups of patterns be considered, those of the source document and those

of the set of source documents. If the patterns come from document type definitions, that would required two document type definitions. In contrast, all the parsing and comparison of elements described by Takasawa is directed to generating a single DTD, whether from a single source document or from multiple source documents.

Thus, Takasawa does not provide the "taking into account common patterns in the mapping process" required by the claims and that the Examiner relies on in combining the references.

### Claim 38 and 40.

Claims 38 and 40 recite that the elements and sub-elements in the source document are mapped to equivalent elements and sub-elements in the set of source documents based on the identified common patterns without user intervention.

In rejecting these claims, the Examiner acknowledged that this feature is not taught by Motoyama. The Examiner went on, however, to state that "Takasawa teaches automatically generating a DTD subsequent to computer analysis of input documents." This statement is unexceptionable. The Examiner goes on to conclude from this that it would have been obvious "to apply Takasawa to Motoyama, providing Motoyama the benefit of automation to free up manual human resources." This is a *non sequitur*. No manual human resources in Motoyama are spent creating DTDs – which is the only automation Takasawa teaches. Combining the features of the two references would not result in the claimed invention, because neither reference teachings doing the mapping without user intervention, which is what the claim requires. To establish *prima facie* obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. *In re Royka*, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). Because the Examiner has failed to show that the limitation of claims 38 or 40 are taught or suggested by the prior art, the rejection of the claims should be withdrawn.

### Claims 37 and 39.

Claims 37 and 39 depend from base claims that have been amended and are allowable for the reasons that apply to their respective base claims.

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In addition, they are allowable for the reasons set forth above in reference to claims 38 and 40, which depend from claims that has not been amended.
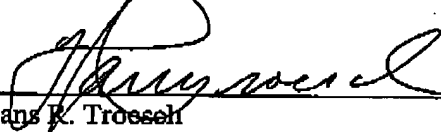
## Conclusion

For the foregoing reasons, the applicant submits that all claims are in condition for allowance.

Please apply any charges or credits to deposit account 06-1050.

Respectfully submitted,

Date: 05 July 05

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